

Exhibit A

Complaint with Authorization for a Warrant

Approved, SCAO 10017670 CK 4/22/14

STATE OF MICHIGAN

5TH JUDICIAL DISTRICT
2ND JUDICIAL CIRCUIT

COMPLAINT
FELONY

CASE NO.

DISTRICT 2014001528
CIRCUIT 2014001528

District Court ORI: MI- 110025J

Circuit Court ORI: MI- 110015J

Defendant's name and address THE PEOPLE OF THE STATE OF MICHIGAN v EDWARD PINKNEY 1940 UNION ST BENTON HARBOR, MI 49022			Victim or complainant		
Codefendant(s) JAMES ARCHIE CORNELIUS			Complaining witness JUAN MATA		
Date: On or about 01/08/2014					
City/Twp./Village ST JOSEPH CITY	County in Michigan BERRIEN	Defendant TCN	Defendant CTN 11-14-001658-01	Defendant SID 1586085P	Defendant DOB 10/27/1948
Police agency report no. 90 14-2068	Charge 1-5) ELECTION LAW FORGERY 6-11) ELECTION LAW-FALSE CERT CIRCULATORY	Maximum penalty			
Witnesses	<input type="checkbox"/> Oper./Chauf. <input type="checkbox"/> CDL	Vehicle Type	Defendant DLN MI P525189000827		
CATHY JAYNE EASTON CAROLYN TOLIVER	MARK T GOFF NEWS 22 VIDEO	DAVID ZIZKOVSKY			

STATE OF MICHIGAN, COUNTY OF BERRIEN

The complaining witness says that on the date and at the location described, the defendant, contrary to law,

CT.1: did commit forgery under the Michigan Election Law by changing the dates on line 2, 3, 4, 5 and 6 on Recall Petition 1, dated 1/03/2014 and either caused to be submitted or aided in the submission of the petition to the Berrien County Clerk as true on January 8, 2014; contrary to MCL 168.937. [168.937]

FELONY: 5 Years and/or \$1,000.00. Court shall order law enforcement to collect DNA identification profiling samples and order defendant to pay \$60.00 assessment.

CT.2: did commit forgery under the Michigan Election Law by changing the dates on line 5 and 6 on Recall Petition 18, dated 1/03/2014 and either caused to be submitted or aided in the submission of the petition to the Berrien County Clerk as true on January 8, 2014; contrary to MCL 168.937. [168.937]

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SURROUNDING STS. MS

Reviewing Prosecutor: MICHAEL J SEPIC

☐ The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 4/23/14 by:
Date
Prosecuting official
<input type="checkbox"/> Security for costs posted

Complaining witness signature
Subscribed and sworn to before me on 4-23-14
Date
Judge/Magistrate/Clerk
Bar no.

Approved, SCAO 10017670 CK 4/22/14

STATE OF MICHIGAN

5TH JUDICIAL DISTRICT
2ND JUDICIAL CIRCUIT

COMPLAINT
FELONY

CASE NO.

DISTRICT 2014001528
CIRCUIT 2014001528

District Court ORI: MI- 1100251

Circuit Court ORI: MI- 1100151

THE PEOPLE OF THE STATE OF MICHIGAN v		Defendant's name and address EDWARD PINKNEY 1940 UNION ST BENTON HARBOR, MI 49022		Victim or complainant	
Codefendant(s) JAMES ARCHIE CORNELIUS				Complaining witness JUAN MATA	
Date: On or about 01/08/2014					
City/Twp./Village ST JOSEPH CITY	County in Michigan BERRIEN	Defendant TCN	Defendant CTN 11-14-001658-01	Defendant SID 1536085P	Defendant DOB 10/27/1948
Police agency report no. 9014-2068	Charge 1-5) ELECTION LAW FORGERY 6-11) ELECTION LAW FALSE CERT CIRCULATORY	Maximum penalty			
Witnesses CATHY JAYNE EASTON CAROLYN TOLIVER	<input type="checkbox"/> Oper./Chauf. <input type="checkbox"/> CDL	Vehicle Type	Defendant DLN MI P525189000827		

MARK T COFF
NEWS 22 VIDEO

DAVID ZIZKOVSKY

STATE OF MICHIGAN, COUNTY OF BERRIEN

The complaining witness says that on the date and at the location described, the defendant, contrary to law,

CT.1: did commit forgery under the Michigan Election Law by changing the dates on line 2, 3, 4, 5 and 6 on Recall Petition 1, dated 1/03/2014 and either caused to be submitted or aided in the submission of the petition to the Berrien County Clerk as true on January 8, 2014; contrary to MCL 168.937. [168.937]

FELONY: 5 Years and/or \$1,000.00. Court shall order law enforcement to collect DNA identification profiling samples and order defendant to pay \$60.00 assessment.

CT.2: did commit forgery under the Michigan Election Law by changing the dates on line 5 and 6 on Recall Petition 18, dated 1/03/2014 and either caused to be submitted or aided in the submission of the petition to the Berrien County Clerk as true on January 8, 2014; contrary to MCL 168.937. [168.937]

CONTINUED ON PAGE 2

Reviewing Prosecutor: MICHAEL J BEPIC

☐ The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on _____ by: _____
Date _____
Prosecuting official _____
<input type="checkbox"/> Security for costs posted

Complaining witness signature

Subscribed and sworn to before me on

Date

Judge/Magistrate/Clerk

Bar no.

PAGE 2 - CONTINUED

EDWARD PINKNEY/2014001528

FELONY: 5 Years and/or \$1,000.00. Court shall order law enforcement to collect DNA identification profiling samples and order defendant to pay \$60.00 assessment.

CT.3: did commit forgery under the Michigan Election Law by changing the dates on line 5, 6, 7 and 8 on Recall Petition 19, dated 1/03/2014 and either caused to be submitted or aided in the submission of the petition to the Berrien County Clerk as true on January 8, 2014; contrary to MCL 168.937. [168.937]

FELONY: 5 Years and/or \$1,000.00. Court shall order law enforcement to collect DNA identification profiling samples and order defendant to pay \$60.00 assessment.

CT.4: did commit forgery under the Michigan Election Law by changing the dates on line 1 through 12 on Recall Petition 38, dated 1/03/2014 and either caused to be submitted or aided in the submission of the petition to the Berrien County Clerk as true on January 8, 2014; contrary to MCL 168.937. [168.937]

FELONY: 5 Years and/or \$1,000.00. Court shall order law enforcement to collect DNA identification profiling samples and order defendant to pay \$60.00 assessment.

CT.5: did commit forgery under the Michigan Election Law by changing the dates on line 1 and 2 on Recall Petition 6, dated 1/03/2014 and either caused to be submitted or aided in the submission of the petition to the Berrien County Clerk as true on January 8, 2014; contrary to MCL 168.937. [168.937]

FELONY: 5 Years and/or \$1,000.00. Court shall order law enforcement to collect DNA identification profiling samples and order defendant to pay \$60.00 assessment.

CT.6: being a person who circulated a Recall Petition, did knowingly make the following false statement in the certificate required by MCL 168.957; to-wit: that he did not permit and/or know a person signed a recall petition more than once; however, Sherrie Gill signed Petition 7, line 9, and also signed Petition 48, line 5; and further that the signatures were obtained through fraud and deceit; contrary to MCL 168.957; [168.957]

MISDEMEANOR: 90 days and/or \$500.00 (see MCL 168.934)

CONTINUED ON PAGE 3

Date

4/23/14

PROSECUTOR'S OFFICE

The Complaining witness asks that the defendant be apprehended and dealt with according to law.

Complaining Witness Signature

SUBSCRIBED AND SWORN TO
BEFORE ME ON 4-23-14

Judge

COPY

PAGE 3 - CONTINUED
EDWARD PINKNEY/2014001528

CT.7: being a person who circulated a Recall Petition, did knowingly make the following false statement in the certificate required by MCL 168.957; to-wit: that he did not permit and/or know a person signed a recall petition more than once; however, Antonio Brown signed Petition 8, line 1, and also signed Petition 14, line 7; contrary to MCL 168.957; [168.957]

MISDEMEANOR: 90 days and/or \$500.00 (see MCL 168.934)

CT.8: being a person who circulated a Recall Petition, did knowingly make the following false statement in the certificate required by MCL 168.957; to-wit: that he did not permit and/or know a person signed a recall petition more than once; however, Michael Roberts signed Petition 20, line 6, and also signed Petition 55, line 9; contrary to MCL 168.957; [168.957]

MISDEMEANOR: 90 days and/or \$500.00 (see MCL 168.934)

CT.9: being a person who circulated a Recall Petition, did knowingly make the following false statement in the certificate required by MCL 168.957; to-wit: that he did not permit and/or know a person signed a recall petition more than once; however, Kendra Cooper signed Petition 22, line 10, and also signed Petition 55, line 12; contrary to MCL 168.957; [168.957]

MISDEMEANOR: 90 days and/or \$500.00 (see MCL 168.934)

CT.10: being a person who circulated a Recall Petition, did knowingly make the following false statement in the certificate required by MCL 168.957; to-wit: that he did not permit and/or know a person signed a recall petition more than once; however, Kenyada Williams signed Petition 48, line 8, and also signed Petition 54, line 2; contrary to MCL 168.957; [168.957]

MISDEMEANOR: 90 days and/or \$500.00 (see MCL 168.934)

CT.11: being a person who circulated a Recall Petition, did knowingly make the following false statement in the certificate required by MCL 168.957; to-wit: that he did not permit and/or know a person signed a recall petition more than once; however, Anthony Cornelius signed Petition 54, line 6, and also signed Petition 55, line 2; contrary to MCL 168.957; [168.957]

MISDEMEANOR: 90 days and/or \$500.00 (see MCL 168.934)

Date

4/23/14

PROSECUTOR'S OFFICE

(P)

The Complainant witness asks that the defendant be apprehended and dealt with according to law.

Complainant Witness Signature

SUBSCRIBED AND SWORN TO
BEFORE ME ON 4-23-14

Judge

COPY

Approved, SCAO

10017670 CK

4/22/14

STATE OF MICHIGAN

5TH
2ND

JUDICIAL DISTRICT
JUDICIAL CIRCUIT

COMPLAINT
FELONY

CASE NO.

DISTRICT
CIRCUIT

201400152B
201400152B

District Court ORI: MI-

110025J

Circuit Court ORI: MI-

110015J

THE PEOPLE OF THE STATE OF MICHIGAN		v EDWARD PINNEY 1940 UNION ST BENTON HARBOR, MI 49022		Defendant's name and address		Victim or complainant	
Codefendant(s)		JAMES ARCHIE CORNELIUS				Complaining witness JUAN MATA	
City/Twp./Village ST JOSEPH CITY		County in Michigan BERRIEN		Defendant TCN 11-14-001650-01		Defendant CTN 15360837	
Police agency report no. 90 14-2068		Charge 1-5) ELECTION LAW FORGERY 6-11) ELECTION LAW FALSE CERT CIRCULARITY		Maximum penalty		Defendant SID 10/27/1948	
Witnesses CATHY JAYNE EASTON CAROLYN TOLIVER		Oper./Chauf. <input type="checkbox"/> CDL		Vehicle Type		Defendant DLN MI P525189000937	

STATE OF MICHIGAN, COUNTY OF BERRIEN

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CT2: MCL 168.937. [168.937]

(b-1) 168.934